

Form 35. Report of Parties' Planning Meeting Pursuant to Fed. R Civ. P 26(f)

Insert Caption Stated in Local Rule 9004-1(a)

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on \_\_\_\_ (date) \_\_\_\_ at \_\_\_\_ (place) \_\_\_\_ and was attended by:

\_\_\_\_ (name) for plaintiff(s) \_\_\_\_ (party name) \_\_\_\_

\_\_\_\_ (name) for defendant(s) \_\_\_\_ (party name) \_\_\_\_

\_\_\_\_ (name) for defendant(s) \_\_\_\_ (party name) \_\_\_\_

2. **Pre-Discovery Disclosures.** The parties [have exchanged] [will exchange by \_\_\_\_ (date)] the information required by Fed. R. Civ. P. 26(a)(1) and Local Rule 7016-1.

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan: [Use separate paragraphs or subparagraphs as necessary if parties disagree.]

a. Discovery will be needed on the following subjects: \_\_\_\_ (brief description of subjects on which discovery will be needed).

b. Disclosure or discovery of electronically stored information should be handled as follows: \_\_\_\_ (brief description of parties' proposals).

c. The parties have agreed to an order regarding claims of privilege or of protection as trial-preparation material asserted after production, as follows: \_\_\_\_ (brief description of provisions of proposed order).

d. All discovery commenced in time to be completed by \_\_\_\_ (date). [Discovery on \_\_\_\_ (issue for early discovery) to be completed by \_\_\_\_ (date).]

e. Maximum of \_\_\_\_ interrogatories by each party to any other party. [Responses due \_\_\_\_ days after service.]

f. Maximum of \_\_\_\_requests for admission by each party to any other party. [Responses due \_\_\_\_days after service.]

g. Maximum of \_\_\_\_depositions by plaintiff(s) and \_\_\_\_by defendant(s).

h. Each deposition [other than of \_\_\_\_] limited to maximum of \_\_\_\_hours unless extended by agreement of parties.

i. Reports from retained experts under Rule 26(a)(2) due:

from plaintiff(s) by \_\_\_\_ (date) \_\_\_\_

from defendant(s) by \_\_\_\_ (date) \_\_\_\_

Supplementations under Rule 26(e) due \_\_\_\_ (time(s) or inter-val(s)) \_\_\_\_.

**4. Other Items.** [Use separate paragraphs or subparagraphs as necessary if parties disagree.]

a. The parties [request] [do not request] a conference with the court before entry of the scheduling order.

b. The parties request a pretrial conference in \_\_\_\_ (month and year) \_\_\_\_.

c. Plaintiff(s) should be allowed until \_\_\_\_ (date) \_\_\_\_ to join additional parties and until \_\_\_\_ (date) \_\_\_\_ to amend the pleadings.

d. Defendant(s) should be allowed until \_\_\_\_ (date) \_\_\_\_ to join additional parties and until \_\_\_\_ (date) \_\_\_\_ to amend the pleadings.

e. All potentially dispositive motions should be filed by \_\_\_\_ (date) \_\_\_\_.

f. Settlement [is likely] [is unlikely] [cannot be evaluated prior to \_\_\_\_ (date) \_\_\_\_] [may be enhanced by use of the following alternative dispute resolution procedure: [\_\_\_\_]].

g. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due

from plaintiff(s) by \_\_\_\_ (date) \_\_\_\_

(As added Apr. 22, 1993, eff. Dec. 1, 1993; amended Apr. 12, 2006, eff. Dec. 1, 2006.)

from defendant(s) by \_\_\_\_ (date) \_\_\_\_

h. Parties should have \_\_\_\_ days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

i. The case should be ready for trial by \_\_\_\_ (date) \_\_\_\_ [and at this time is expected to take approximately \_\_\_\_ (length of time) \_\_\_\_].

**5. [Other matters.]**

Date: \_\_\_\_\_